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January 23, 2015

Environmental Protection Agency
Regional Freedom of Information Officer
U.S. EPA, Region 5
(MI-9)
77 West Jackson Boulevard
Chicago, IL 60604-3590

Re: Reba Greene v. Georgia-Pacific LLC
Freedom of Information Act Request

Dear FOIA Officer:

My office currently represents Georgia-Pacific LLC, a defendant in asbestos lawsuit in Madison County, Illinois. As part of my investigation, we need to obtain the documents listed below for:
Joliet Army Ammunition Plant, formerly known as the Joliet Arsenal,
Load Assembly Packing Area and Manufacturing area (EPA ID: IL0210090049 and IL7213820460).

The documents we request are as follows:

- Any and all documents pertaining to safety and training, including, but not limited to, working with or around potentially asbestos-containing materials;
- Any and all documents pertaining to air sampling, air monitoring or personal air monitoring;
- Any and all documents reflecting the names of industrial hygiene or safety personnel involved in asbestos abatement, removal, or air sampling/testing;
- Any and all documents relating to asbestos abatement work at the above-listed sites;
- Any and all documents pertaining to any employee, contractor, subcontractor, or any employee thereof, claim for injuries allegedly due to exposure to asbestos at any time;
- Any and all documents pertaining to recommendations, regulations, or citations regarding asbestos, including but not limited to those from the Occupational Health and Safety Administration (OSHA) and the American Conference of Governmental Industrial Hygienists (ACGIH);
- Any and all documents regarding any asbestos containing insulation and/or the use of any asbestos containing insulation present at the above-listed sites;
- Any and all documents related to the specific products actually produced, manufactured and/or assembled at the above-listed sites;

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- Any and all documents related to the use of asbestos-containing materials or components in the production, manufacturing and/or assembling of the products at the above-listed sites;
- Any and all documents regarding insulators; engineers; insulation removal/abatement contractors; and or demolition contractors contracted to perform work at the above listed sites;
- Any and all documents relating to the above-listed sites participation in the Installation Restoration Program, including but not limited to the U.S. Army's Phase I records search and Phase II preliminary survey.

We are willing to pay up to \$200 for this request. Please contact me if you believe this amount will not be sufficient to cover our requests.

Due to the nature of this litigation, we appreciate this information to be as extensive as possible. We would like this information if at all possible by February 9, 2015. If you are unable to meet this deadline please contact me as soon as possible at 618-307-1116 or aar@heplerbroom.com.

Thank you for your consideration of this request.

Sincerely,

/s/ 
Anna Rostovtsev, Attorney